

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. RENÉE MARIE BUMB
CHIEF JUDGE

*Robert Garcia v. Zhejiang Huahai
Pharmaceutical Co., Ltd.,
(Case 1:20-cv-07957-RMB-SAK)*

**NOTICE OF SECOND VIDEOTAPED DEPOSITION OF
PLAINTIFF ROBERT GARCIA**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure, the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), and the Case Management Schedule for the Second Wave of Potential Personal Injury Bellwether Plaintiff Trials (filed March 12, 2025 – ECF No. 2988), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Robert Garcia, on April 16, 2025, beginning at 10:00 a.m. EST, and continuing until completion, at a location to be identified by agreement of counsel. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should notify the attorney contact for the deposition listed below to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

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Date: March 14, 2025

Respectfully submitted,

/s/ Steven M. Harkins

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*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2025, I caused a true and correct copy of the foregoing Notice of Second Videotaped Deposition of Plaintiff Robert Garcia to be filed with the Court's ECF system and served upon the below counsel of record by e-mail:

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This 14th day of March, 2025.

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